

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

**JONATHAN GAFFERS**, individually, and on  
behalf of others similarly situated,

Plaintiffs,

Case No. 16-10128

vs.

Hon. David M. Lawson

**KELLY SERVICES, INC.**,  
a Michigan corporation

Defendant.

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**DECLARATION OF BARBARA MCCANHAM**

I, Barbara McCanham, based on my personal knowledge and pursuant to 28 U.S.C. § 1746, declare as follows: declare:

1. I am a KellyConnect Training Manager for Kelly Services, Inc. (“Kelly”). I am familiar with the training provided to KellyConnect employees, including those in the AppleCare and AOS programs, and I have personal knowledge regarding the matters described in this declaration.

2. I submit this declaration in support of Kelly's Response In Opposition To Plaintiff's Pre-Discovery Motion For Conditional Class Certification And Court-Supervised Notice Pursuant To 29 U.S.C. § 216(b).

3. KellyConnect employees go through four stages of training: (1) New Employee Training; (2) Training Orientation; (3) New Advisor Training; and (4) Ramp Up, in that order.

4. Attached as Exhibit 1 to my Declaration is a true and correct copy of Slide 57 used in the New Employee Training of AppleCare employees.

5. Attached as Exhibit 2 to my Declaration is a true and correct copy of Slide 57 used in the New Employee Training of AOS employees.

6. Attached as Exhibit 3 to my Declaration is a true and correct copy of slides uses during Ramp Up training for AppleCare employees.

I declare under penalty of perjury under the laws of the State of Michigan and the United States that the foregoing is true and correct.

DATED: April 22, 2016

By: Barbara McCanham  
Barbara McCanham